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MAR 22 2019

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

Ayo DUNN

(Enter above the full name  
of the plaintiff or plaintiffs in  
this action)

19cv2006  
Judge Norgle  
Mag. Judge Valdez  
PC 4

vs.

Case No. \_\_\_\_\_  
(To be supplied by the Clerk of this Court)

Director: Mr. Gavin of Central Kitchen

Director: Mr. McKay of Central Kitchen

Director: Mr. Dunlap of Central Kitchen

S.M.B. Correctional Food Services

Premier management

Superintendent of Central Kitchen

(Enter above the full name of ALL  
defendants in this action. Do not  
use "et al.")

Amended complaint

CHECK ONE ONLY:

☒ COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983  
U.S. Code (state, county, or municipal defendants)

☐ COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE  
28 SECTION 1331 U.S. Code (federal defendants)

☐ OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR  
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**



AFO JOM

VS.

COOK COUNTY

Tom Dart



**I. Plaintiff(s):**

- A. Name: Ayo Dunn
- B. List all aliases: \_\_\_\_\_
- C. Prisoner identification number: ~~Cook County Jail~~ 20181017024
- D. Place of present confinement: Cook County Jail
- E. Address: 2600 California / Division 8-30  
Chicago IL 60608

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

**II. Defendant(s):**

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: Mr Gavin: Food director of Central Kitchen  
Title: Director of Kitchen in Cook County Jail  
Place of Employment: Cook County Jail
- B. Defendant: Mr McKay  
Title: Director of Central Kitchen of Cook County Jail  
Place of Employment: Cook County Jail
- C. Defendant: Mr Dunlap  
Title: Director of Central Kitchen of Cook County Jail  
Place of Employment: Cook County Jail

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)



## Plaintiff(s):

D.

Name: C.M.B. Correctional Food Service

title: Supervisor's over ~~the~~ Premier

Place of Employment: Cook County Jail

E.

Name: Premier management

title: Food Supervisor's

Place of Employment: Cook County Jail

F. Superentendent of Central Kitchen

title: over see'er of Central Kitchen

G. Name: Tom Dart

title: Cook County Sheriff

Place of Employment: Cook County Jail

H. Name: Cook County

title: county of the Jail

Place of Employment: Cook County



III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

- #190553  
Civil  
pending
- A. Name of case and docket number: ~~XXXXXXXXXXXXXXXXXXXX~~ AYO DUNN V. SERGEANT SPEARS ET AL
- B. Approximate date of filing lawsuit: 1-28-19 ~~XXXXXXXXXXXX~~
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: Ayo Dunn
- D. List all defendants: Sergeant Spears Cook County Officer
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): Federal
- F. Name of judge to whom case was assigned: Charles Norgle, Sr  
Maria Valdez
- G. Basic claim made: Assult Battery
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): Still pending
- I. Approximate date of disposition: ~~XXXXXXXXXX~~ N/A

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.



III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

- A. Name of case and docket number: Civil 1:19-CV-00216  
Ayo Dunn v. Cook County Sheriff
- B. Approximate date of filing lawsuit: 1-11-19
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: Ayo Dunn
- D. List all defendants: Cook County Sheriff, etc,  
et, Al
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): Federal
- F. Name of judge to whom case was assigned: Charles R. Norgle SR.  
Maria Valdez
- G. Basic claim made: Slip and Fall back Injury
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? <sup>yes</sup>  
 Is it still pending?): Dismissed because I ~~didn't~~ did not  
state a claim
- I. Approximate date of disposition: 2-15-19

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.



#### IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

ON 11-16-18 I was working Central Kitchen of the Cook County Jail for detainees when I slip on a wet floor where No <sup>Signs</sup> ~~signs~~ were put out stating Caution wet floor. A phone call was made while still at central kitchen E.M.T. came I was taken away by E.M.T. on a stretcher to Strogers Hospital for X-ray. When X-Rays were taken a hour later I was told by the doctor that "Disk Bulge in my spine a second Doctor told me that surgery will fix my spine I was sent back to Cook County Jail re-Housed in Cook County Jail Division 8 R.T.U Medical Do to my Inj. Injury I now walk with a cane and used a wheel chair for long distance. I'm on pain medication that dose not help ~~at~~ at all I wake up with tears at night due to Excruciating pain on 2-22-19 I was put on a new medication call gabapenten which not helping at all I also <sup>wrote</sup> ~~wrote~~ a grievance about the medication that's not helping, the



Controll Number to that grievance is 2018X15202-0114889  
 ON 12-24-18 a MRI were taken at Stragers Hospital  
 ON 1-7-19 I saw a doctor I ask a doctor  
 for a Copy of my Midical records but I was  
 denied them. due to my back pain I ~~not~~ now go  
<sup>to</sup> ~~more~~ physical therapy. Also told by case worke  
 us Booker to write the police station 35<sup>th</sup> Michigan  
 to get my medical Records from my understanding  
 that's a Hypo law.

Claim 1. The boots they hand-out dosen't protect you  
 from falling in that type of enviornment. Only  
~~per~~ protect you from getting your feet wet.

#2. We are to wear rubber boots to keep socks  
 shoes dry it dosen't Not provent fallin  
 and due to that I slip on a verzy wet floor  
 an Inyred my back and spine.

#3 There are No <sup>Signs</sup> ~~signs~~ on Walls or Windows stating  
 Caution when were wearing boots still a risk  
 Of Slipping, sliding, or falling etc.



#4 I MR. Dunn are Not the only person <sup>get</sup> to hurt ~~working~~ working at Cook County Jail Central Kitchen.

#5 When a detainee report something that's unhealthy or unsafe due to the job. Nothing been done.

#6 When a supervisor I worked for Not Filiam. With his Name saw what happened and wrote the incident report.

#7 the supervisor also stated to me that he been complaining about it, to find a way to make this area safe for the supervisor's and detainees to work.

#8 The Hispic Supervisor <sup>Name</sup> ~~is~~ Jesus Has pool that he wrote about trying to find a way to make it more safe. By writeing compliants about making it safer.

#9 Premire Need to get their safty in order before someone ~~eyes~~ else get hurt or they fall and break their neck and not live to tell



about it. MR Tom Dart is also responsible for this matter at ~~his~~ hand because he runs the Cook County Jail and everything that goes on in Cook County Jail. He has to walk around and check thing out. (I'm sure) from time to time

#10 I am seeking compensation damage, and or anything else that will help me and other pre-trial detainees safety.

#11 I Ayo Dunn is suing all the defendants in their individual and official capacities for violating Ayo Dunn rights guaranteed under the fourteenth amendment of the United States ~~Constitution~~ Constitution, to live and work in a safe and healthy environment while a pre-trial detainee.

#12 I keep getting denied my medical records.

#13 I was told by the physical therapist that this pain will stay with me for the rest of my life. Also I <sup>might</sup> ~~know~~ have nerve damage.



Because my spine has sharp pain and keeps me from sleeping and I will need stronger pain medication or a shot in my spine to relieve some of the pain

#14 I am <sup>IN</sup> Need of help

#15 The area where I injury myself doesn't have a slip free ~~sim~~ floor. Also it's caught on creamer.  
(When I slipped)

#16 The ~~Supercat~~ <sup>superintendent</sup> the ~~superintendent~~ is very aware of the safety issues that going on in central kitchen. Nothing is being done. (There's no doubt in my mind that they have to walk around the kitchen from time to time.)

#17 Directors: ~~the~~ ~~the~~ ~~the~~ is very aware of safety issues that goes on in central kitchen and is responsible for detainees safety when working in central kitchen of Cook County jail, or should know what is going on within the central kitchen when it comes to safety. I was always told that safety is first.

#18 Tom Dart <sup>==</sup> should be aware of this issues because it part of his job. And is his job to make sure detainees and staff are safe and unharmed.



V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

Plaintiff seeks compensatory and Punitive  
Damages to be specified at a later Date.

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 11 day of 3, 2019

Ayo Dunn

(Signature of plaintiff or plaintiffs)

Ayo DUNN

(Print name)

20181017024

(I.D. Number)

P.O. Box 089002

Chic 99076 60608

(Address)

AYO DUNN #20181017024  
P.O. BOX 089002  
Chicago IL 60608



03/22/2019-2



CLERK OF U.S. DISTRICT COURT  
UNITED STATES COURT HOUSE  
Chicago IL 60604

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CLERK  
U.S. DISTRICT COURT

19cv2006  
Judge Norgle  
Mag. Judge Valdez  
PC 4